

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

KD Graphics, Inc., and	:	
Jeffrey Kwait,	:	
Plaintiffs,	:	Civil Action
v.	:	No. 02CV4041
Tropical Graphics, Inc., and	:	
Paul Hirst,	:	Jury Trial Demanded
Defendants.	:	
	:	

PLAINTIFFS' RULE 26(a) DISCLOSURE STATEMENT

Plaintiffs KD Graphics ("KD") and Jeffrey Kwait ("Kwait") by and through their attorneys Stein & Silverman, P.C. makes the following self-executing disclosure pursuant to the Federal Rules of Civil Procedure:

Plaintiffs reserve the right to supplement this submission should they become aware of additional responsive information.

26(a)(1)(A): Persons likely to have discoverable information that plaintiff may use to support claims or defenses.

1. Jeffrey Kwait
2. Christie Kwait
3. Nancy Baldomero

26(a)(1)(B): Documents in plaintiffs' possession which may be used to support claims.

Copies of the following documents are located at the offices of Stein & Silverman, P.C., 230 South Broad Street, Philadelphia, PA 19102.

1. Phone records
2. Computer tracing documents - PING

3. Printouts of emails received as a result of defendants
4. Business billing records

26(a)(1)(C): Computation of damages.

Plaintiff has suffered unliquidated damages.

26(a)(1)(D): Insurance.

There is no applicable insurance policy.

DATE: September 10, 2002

STEIN & SILVERMAN, P.C.

Andrew Lapat
230 S. Broad Street, 18th Floor
Philadelphia, PA 19102
(215) 985-0255